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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION  
11

12 Maxine Ellis,

13 Plaintiff,

14 vs.

15 DotNext Inc., LeapFish Inc., Behnam  
Behrouzi, Russell Safar, and DOES 1-10,

16 Defendants.  
17

Case No. 3:10-cv-01599-BZ

**STIPULATION AND ~~(PROPOSED)~~  
ORDER EXTENDING DEFENDANTS'  
TIME TO RESPOND TO THE  
SUPPLEMENTAL COMPLAINT**

Case Filed: April 14, 2010  
Judge: Hon. Bernard Zimmerman

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19 On February 9, 2011, the Court issued an Order granting Plaintiff Maxine Ellis leave to  
20 file a supplemental complaint. (PACER Document # 73) The Order also required Defendants to  
21 respond to the supplemental complaint on or before February 23, 2011.

22 However, the parties have reached a tentative settlement. The parties are in the final  
23 stages of negotiating the terms of the settlement and are in the process of finalizing a settlement  
24 agreement.

25 As it appears that the parties will settle this action, Plaintiff Maxine Ellis and Defendants  
26 DotNext Inc. and Behnam Behrouzi, by and through their respective counsel of record, hereby  
27 stipulate, pursuant to Civil Local Rules 6-1 and 6-2, for an order extending the date by which  
28 Defendants must respond to the supplemental complaint by 30 days to March 25, 2011. Good

1 cause exists for this request because, if this action settles as anticipated, the extension of time will  
2 allow Defendants to avoid the unnecessary expense, including attorneys' fees, associated with  
3 responding to the supplemental complaint. This Stipulation is supported by the accompanying  
4 Declaration of Bruno Tarabichi.

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6 Dated: February 21, 2011

Respectfully submitted,

OWENS TARABICHI LLP

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9 By /s/ Bruno Tarabichi  
David R. Owens  
Bruno W. Tarabichi  
Attorneys for Defendants

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12 Dated: February 21, 2011

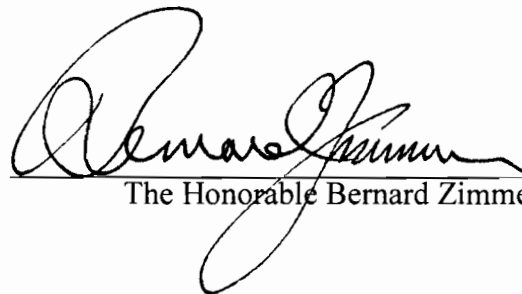
Respectfully submitted,

HIGHMAN, HIGHMAN & BALL

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15 By /s/ Bruce Highman  
Bruce Highman  
Attorneys for Plaintiff

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18 IT IS SO ORDERED.

19 Dated: 22 Feb 11

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The Honorable Bernard Zimmerman